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8 **UNITED STATES DISTRICT COURT**  
9 **EASTERN DISTRICT OF CALIFORNIA**  
10 **FRESNO COURTHOUSE DIVISION**

11 AMANDA RACHELLE METZGER, } Case No.: 2:24-cv-02639-CSK  
12 Plaintiff, } **STIPULATION AND PROPOSED ORDER**  
13 v. } **FOR AN EXTENSION OF TIME FOR**  
14 CAROLYN COLVIN, } **PLAINTIFF TO FILE HER MOTION**  
15 Acting Commissioner of Social Security,<sup>1</sup> } **FOR SUMMARY JUDGMENT AND**  
16 Defendant. } **SUPPORTING BRIEF**  
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IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that Plaintiff shall have an extension of time to file her Motion for Summary Judgment and Supporting Brief. This is Plaintiff's first request for an extension.

Plaintiff respectfully requests that this Court grant a 30-day extension to file her Motion

<sup>1</sup> Carolyn Colvin became the Acting Commissioner of Social Security on November 30, 2024, and is automatically substituted as a party pursuant to Fed. R. Civ. P. 25(d). *See also* section 205(g) of the Social Security Act, 42 USC 405(g) (action survives regardless of any change in the person occupying the office of Commissioner of Social Security). No further action needs to be taken to continue this suit by reason of the last sentence of section 405(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 for Summary Judgment and Supporting Brief. There is good cause for this request. The certified  
2 administrative record exceeds 3,000 pages, and Plaintiff intends on raising multiple fact-intensive  
3 issues. This, combined with counsel's work load, has made this request became necessary.  
4 Plaintiff will endeavor to submit her brief in advance of the extended deadline, but based on the  
5 foregoing respectfully requests an extension in order to ensure that the issues are fully and  
6 concisely presented to the Court.  
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8 The parties further stipulate that the Court's Scheduling Order shall be modified  
9 accordingly.  
10

11 Respectfully submitted,  
12

13 December 23, 2024  
14 DATED

15 /s/ Sherianne Laba  
16 SHERIANNE LABA, ESQUIRE  
17 Attorney for Plaintiff, Amanda Rachelle Metzger

18 December 23, 2024  
19 DATED

20 By: /s/ Justin L. Martin  
21 (\*as authorized by email on December 20, 2024)  
22 Special Assistant U.S. Attorney  
23 Attorney for Defendant

24 **ORDER**

25 Pursuant to the parties' stipulation, IT IS SO ORDERED that Plaintiff Amanda Rachelle  
26 Metzger shall have a thirty (30) day extension, until January 31, 2025, to file her opening brief.  
27 All other deadlines to be determined by reference to the Supplemental Rules for Social Security  
28 Actions under § 405(g) and the Court's procedural order.

29 DATED: December 23, 2024

30   
31 CHI SOO KIM  
32 UNITED STATES MAGISTRATE JUDGE

33 5, metz.2639.24

34 Extension of Time Stipulation, (Case # 2:24-cv-02639-CSK)